GIA Environmental Health and Safety Wastewater Quality Management Standard

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ABSTRACT: This GIA standard defines the basic elements and responsibilities of a site Wastewater Quality Management Program.

APPLICABILITY: This standard shall apply to GIA facilities and operations worldwide unless superseded by more stringent local regulations.

STATUS: APPROVED 24-Dec-1991; use VTX SMC for current status.

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CONTENTS

1 INTRODUCTION 1
1.1 SCOPE 1
1.1.1 Policy 1
1.2 RESPONSIBILITIES 1
1.3 LANGUAGE REQUIREMENT FOR THIS STANDARD 3

2 PROGRAM ELEMENTS 3
2.1 REGULATORY COMPLIANCE 3
2.2 INVENTORY AND TRACKING 3
2.3 MONITORING AND REPORTING 3
2.4 DISCHARGE REDUCTION/WASTE MINIMIZATION 4
2.5 EQUIPMENT MAINTENANCE 4
2.6 EVALUATION OF PERMITTING REQUIREMENTS 4
2.7 PERMIT MAINTENANCE 5
2.8 PROCESS INSTALLATION OF MODIFICATION 5
2.9 RESPONSE TO VIOLATION 5

Appendix A RELATED DOCUMENTS 7

A.1 EL-Class Digital Documents 7

1 INTRODUCTION

The purpose of this GIA standard is to define the basic elements and responsibilities of a site Wastewater Quality Management Program.

1.1 SCOPE

This standard shall apply to GIA facilities and operations worldwide unless superseded by more stringent country and/or local regulations.

1.1.1 Policy

Each site shall develop, document, and implement a Wastewater Quality Management program.

1.2 RESPONSIBILITIES

This subhead describes the responsibilities of persons involved in fulfilling the requirements of this document.

- Site Manager

  Ensure the site or plant is in compliance with all applicable wastewater quality regulations.

  Ensure that site Environmental Health and Safety (EH&S) personnel are knowledgeable and sufficiently trained to implement this standard.

  Sign all reports required by regulatory agencies.

  Review and sign all permit applications.

  Consult on notification of regulatory agencies in the event of a violation.

  Hold employees accountable for their portions of this standard.

- Department Managers and Supervisors, Engineering Staff, and Facilities Staff.

  Ensure existing equipment, including water pollution control equipment, is properly maintained.

  Inform site EH&S well in advance of any planned change or addition to process equipment that could result in a change, positive or negative, to any wastewater discharge.

  Inform site EH&S of any equipment malfunction or process excursion that could have resulted in a change in the wastewater discharge or could affect the operation of any treatment system.

  Provide leadership in the development and implementation of new and innovative discharge control strategies to meet the goals of wastewater reduction.

- Operators and Employees

  Verify that existing equipment, including control equipment, is maintained.

  Inform the supervisor of any equipment malfunction or process upset.

  Notify EH&S of any discharges that may adversely affect wastewater treatment operations or wastewater effluent quality.

  Assist in the development and implementation of new technologies to meet the goals of wastewater reduction.

  Attend training, as required.

- Site Environmental Health and Safety (EH&S)

  Develop and implement the Wastewater Quality Management Program.

  Interact, as necessary, with regulatory agencies.

  Acquire and maintain on-site, copies of up-to-date country and local wastewater regulations.

  Be knowledgeable of the current and emerging requirements of applicable wastewater quality or discharge regulations.

  Evaluate wastewater discharge quality to determine the level of permitting that is required.

  Annually review the status of wastewater discharge permits and ensure they are maintained up-to-date.

  Assist manufacturing, engineering, and facilities personnel in the permitting and control requirements for new processes and facilities. Review all new processes at the design, capital approval request stage. Work with appropriate personnel, such as external consultants and engineers and so forth, to be sure the design of new processes include applicable wastewater control requirements.

  Verify any suspected violations in wastewater quality or effluent discharge regulations and notify and consult with all appropriate individuals, including the Plant Manager, the Law Department, and Area EH&S.

  Notify the regulatory agency of any verified violation, if appropriate. If possible, consult with management, Area EH&S, and the Law Department prior to notification.

  Assist in the development and implementation of appropriate abatement strategies to meet the goals of wastewater reduction.

  Conduct any required wastewater monitoring to prepare permits and comply with reporting requirements.

Maintain and track projects that both minimize wastewater discharges and the annual cost of the Wastewater Quality Program.

- Area Environment Health and Safety (EH&S)

  Provide consultation and training, as required.

  Assist in the development and implementation of abatement strategies.

  Assist in notification procedures in the event of a violation.

  Review wastewater quality regulatory reports, chemical profile analyses, and program costs.

  Review capital approval requisitions for new wastewater quality control equipment and modifications to existing equipment.

1.3 LANGUAGE REQUIREMENT FOR THIS STANDARD

The details of this standard and all documentation associated with it, such as manuals, training materials, signs, labels, postings, and so forth, must be available in English and the accepted and official local languages.

2 PROGRAM ELEMENTS

This segment describes the elements of the Wastewater Quality Management Program that include regulatory compliance, inventory, tracking, monitoring, and reporting.

2.1 REGULATORY COMPLIANCE

A plan shall be in place and documented to maintain compliance with applicable local and country regulations at a minimum.

2.2 INVENTORY AND TRACKING

A plan shall be in place to inventory and track all regulated pollutants as appropriate and applicable to site discharge reduction strategy and local and/or country regulations.

2.3 MONITORING AND REPORTING

Each facility shall monitor its wastewater discharge as required by local regulatory authorities.

Certified analytical results shall be used for all regulatory reporting requirements.

A file of all compliance reports shall be maintained at the site, and copies sent to Area EH&S and the Law Department.

2.4 DISCHARGE REDUCTION/WASTE MINIMIZATION

A waste minimization plan shall be developed, implemented, maintained, and documented. The process units shall be responsible for new and existing processes, to reduce emissions of regulated materials.

The plan shall require the use of nonregulated materials or materials with reduced toxicity.

The plan shall require implementation of in-line treatment, recycling, reclamation, and techniques to conserve resources.

The plan shall prohibit transferring pollutants from one medium to another, where possible, unless that transfer reduces the overall toxicity of the discharge.

Efforts to reduce the amount or toxicity of pollutants in the discharge shall be documented.

A mass balance report shall be generated annually.

The annual cost of the Wastewater Quality Program shall be documented.

2.5 EQUIPMENT MAINTENANCE

A plan shall be in place to correctly operate and maintain all equipment that discharges or controls the discharge of regulated pollutants. Record keeping and supervisory approval requirements shall be included in the plan.

Process control equipment shall be inspected, at least quarterly, to ensure its proper operation and maintenance. Records of these activities shall be maintained.

Equipment specifications and up-to-date drawings, including wastewater discharge points, are to be kept on file.

Process flow and piping diagrams shall be kept current.

2.6 EVALUATION OF PERMITTING REQUIREMENTS

The wastewater discharge permitting requirements of the facility shall be evaluated based on the:

Discharge inventory

Equipment specifications

Applicable regulations

Construction or modification of operations impacting wastewater quantity and quality shall not begin until all necessary permit approvals have been secured, or it is determined that a permit or permit modification is not required.

At a minimum, all wastewater discharges from the facility must meet applicable requirements included in the permit conditions of the facility and any applicable regulations.

2.7 PERMIT MAINTENANCE

Evaluation of the permit status of the facility shall be performed annually and be based on changes in the:

Regulations

Process

Production rates

Permits must be maintained to ensure the permit is current, that all fees have been paid, and that files are maintained.

An inventory of all permits shall be maintained at the site or plant and updated annually. The permit inventory shall include identification of all point sources, major permit conditions, and restrictions.

2.8 PROCESS INSTALLATION OF MODIFICATION

An assessment of the regulatory impact must be made during the planning and design of any new facility or any modification of a facility or process that could trigger additional regulatory requirements.

The assessment must identify or confirm wastewater discharges and evaluate them with respect to the regulations and any existing permit(s).

A compliance strategy shall be developed if the assessment indicates that the installation or modification would trigger additional regulatory requirements.

A toxic use reduction strategy shall be part of all planning and design for process installations and modifications.

2.9 RESPONSE TO VIOLATION

Any suspected violations of a wastewater discharge permit condition must be immediately verified for accuracy by site EH&S.

Any substantiated violation must be reported to the Plant Manager, Area EH&S, and the Law Department as soon as verification is made.

In any noncompliance situation, the cause of the violation is to be identified, and corrective action undertaken as soon as possible.

Any verbal and written notification(s) to regulatory agencies shall be made, when appropriate, and within the required time frame after consultation with the Plant Manager, Area EH&S, and the Law Department. Document all verbal correspondence.

A documented investigative report shall be prepared and sent to Area EH&S, the Law Department, and the appropriate regulatory agencies, as required. All reports are to be retained on-site.

APPENDIX A RELATED DOCUMENTS

A.1 EL-Class Digital Documents

EL-Class Number	Document Title
EL-CP758-00	*Corporate Waste Management Policy—Principles of Waste Management*
EL-CP758-01	*Corporate Waste Management Policies—Process*
EL-CP758-02	*Corporate Waste Management Policy—Disposition and Reclamation of Inventory and Fixed Assets*

Use VTX SMC to order copies of EL-class documents from Standards and Methods Control. Send distribution questions to JOKUR::SMC or call DTN: 234-4423.

EL-CP758-00, EL-CP758-01, and EL-CP758-02 are also available through VTX WASTE. This document is available through VTX WASTE, or contact Corporate Waste Management at MSO2-1/11.

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